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**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

January 26, 2024

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1140 - Massachusetts Republican Party and  
Patrick Crowley, Treasurer (C00042622)

RESOLUTION TERMS: Certify annually for two years that the Committee continued to retain the services of a compliance firm; certify the Committee amended relevant 2021-2022 reports or filed a Form 99 after consultation with the FEC's Reports Analysis Division (RAD); certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$6,450.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1140 (RAD 23L-52). The ADR Office received this referral on September 19, 2023.

**SUMMARY:** RAD referred Massachusetts Republican Party and Patrick Crowley, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2021-2022 election cycle. The Committee's errors included: failure to provide supporting schedules, federal election activity/levin funds, and allocated federal and non-federal activity.

During negotiations, Respondents acknowledged that the Committee experienced reporting challenges during the 2021-2022 election cycle. Specifically, the Committee stated that the errors were the result of internal miscommunications. The Committee states it has since transferred its compliance operations to an external compliance firm.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Massachusetts Republican Party and Patrick Crowley, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.